

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TOBIAS MOELLER-BERTRAM,  
individually, and on behalf of all others  
similarly situated,

Plaintiff,

v.

GEMINI TRUST COMPANY, LLC; and  
DIGITAL CURRENCY GROUP, INC.,

Defendants.

Case No. 1:23-cv-02027

Hon. Lewis J. Liman

**DECLARATION OF CAROLINE HICKEY ZALKA  
IN SUPPORT OF DIGITAL CURRENCY GROUP, INC.'S  
MOTION TO TRANSFER TO THE DISTRICT OF CONNECTICUT**

I, Caroline Hickey Zalka, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm Weil, Gotshal & Manges LLP, 767 5th Avenue, New York, New York 10177, counsel to Defendant Digital Currency Group, Inc. I submit this declaration in support of Digital Currency Group, Inc.'s Motion to Transfer to the District of Connecticut.

2. Attached hereto as Exhibit A is a true and correct copy of a securities class action complaint filed on January 23, 2023 in the United States District Court for the District of Connecticut, under the caption *McGreevy et al v. Digital Currency Group, Inc. et al*, 3:23-cv-00082-SRU (D. Conn.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of May 2023.

/s/ Caroline Hickey Zalka  
Caroline Hickey Zalka